



North America Europe Asia

200 Park Avenue  
New York, NY 10166  
T +1 212 294 6700  
F +1 212 294 4700

**ALDO A. BADINI**

Partner

(212) 294-4601

abadini@winston.com

June 3, 2014

**VIA ECF**

Hon. Vernon S. Broderick, U.S.D.J.  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

Re: *TreeHouse Foods, Inc. v. Green Mountain Coffee Roasters, Inc.*, No. 14 Civ. 905 (VSB) (S.D.N.Y.) and related cases Nos. 14 Civ. 905 (VSB), 14 Civ. 1609 (VSB), 14 Civ. 1671 (VSB), 14 Civ. 1716 (VSB), 14 Civ. 1836 (VSB), 14 Civ. 1963 (VSB), 14 Civ. 2219 (VSB), 14 Civ. 2255 (VSB), 14 Civ. 2267 (VSB), 14 Civ. 2530 (VSB), 14 Civ. 2582 (VSB), 14 Civ. 2670 (VSB), 14 Civ. 2692 (VSB), 14 Civ. 3018 (VSB), 14 Civ. 3032 (VSB), 14 Civ. 3790 (UA).

Dear Judge Broderick:

We write on behalf of all parties in the above-captioned actions and in follow up to the May 1, 2014 conference. We are pleased to inform the Court that the parties have reached agreement as to a Stipulated Protective Order, which was submitted today via email to the Orders and Judgments Clerk per the ECF Rules.

Respectfully submitted,

By: /s/ Aldo A. Badini

Aldo A. Badini

Susannah P. Torpey

**Winston & Strawn LLP**

200 Park Avenue

New York, NY 10166

Telephone: (212) 294-6700

abadini@winston.com

storpey@winston.com

Dan K. Webb (*pro hac vice*)  
James F. Herbison (*pro hac vice*)  
35 West Wacker Drive  
Chicago, IL 60601  
Telephone: (312) 558-5600  
dwebb@winston.com  
jherbison@winston.com

Diana L. Hughes (*pro hac vice*)  
101 California Street  
San Francisco, CA 94111  
Telephone: (415) 591-1000  
dhughes@winston.com

*Counsel for Plaintiffs TreeHouse Foods,  
Inc., Bay Valley Foods, LLC, and Sturm  
Foods, Inc.*

By: /s/ Lev. L. Dassin  
Lev L. Dassin  
**Cleary Gottlieb Steen &  
Hamilton LLP**  
One Liberty Plaza  
New York, NY 10006  
Telephone: (212) 225-2790  
ldassin@cgsh.com

George S. Cary  
Leah Brannon  
2000 Pennsylvania Avenue NW  
Washington, DC 20006  
Telephone: (202) 974-1920  
gcary@cgsh.com  
lbrannon@cgsh.com

Wendelynn J. Newton  
**Buchanan Ingersoll & Rooney,  
P.C.**  
One Oxford Centre  
301 Grant Street, 20th Floor  
Pittsburgh, PA 15219-1410

Telephone: (412) 562-8932  
wendelynn.newton@bipc.com

*Counsel for Defendant Keurig Green  
Mountain, Inc.*

By: /s/ Michael M. Buchman

Donald A. Migliori  
William H. Narwold  
Michael M. Buchman  
John A. Ioannou  
Alex R. Straus  
**Motley Rice LLC**  
600 Third Avenue, 21<sup>st</sup> Floor  
New York, NY 10016  
Telephone: (212) 577-0040  
dmigliori@motleyrice.com  
bnarwold@motleyrice.com  
mbuchman@motleyrice.com  
jioannou@motleyrice.com  
astraus@motleyrice.com

*Interim Co-Lead Counsel for Direct  
Purchaser Class & Counsel for  
Plaintiff Judy Hoyer*

By: /s/ Bernard Persky

Bernard Persky  
Kellie Lerner  
Hollis L. Salzman  
**Robins, Kaplan, Miller & Ciresi  
LLP**  
601 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 980-7400  
bpersky@rkmc.com  
klerner@rkmc.com  
hsalzman@rkmc.com

K. Craig Wildfang  
Thomas J. Undlin  
Stephen P. Safranski  
800 La Salle Avenue,  
2800 LaSalle Plaza

Minneapolis, MN 55402  
Telephone: (612) 349-8500  
kcwildfang@rkmc.com  
tjundlin@rkmc.com  
spsafranski@rkmc.com

*Interim Co-Lead Counsel for Direct  
Purchaser Class & Counsel for  
Plaintiff Ney Silverman Insurance  
Associates, LLC*

By: /s/ Linda Nussbaum  
Linda P. Nussbaum  
Peter Anthony Barile, III  
**Grant & Eisenhofer P.A.**  
485 Lexington Avenue  
29th Floor  
New York, NY 10017  
Telephone: (646) 722-8500  
pbarile@gelaw.com  
lnussbaum@gelaw.com

*Interim Co-Lead Counsel for Direct  
Purchaser Class & Counsel for  
Plaintiffs Henry A. Rucker, LLC and  
David Rosenthal*

By: /s/ Robert N. Kaplan  
Robert N. Kaplan  
Lauren I. Dubick  
Gregory K. Arenson  
Mario M. Choi  
**Kaplan Fox & Kilsheimer, LLP**  
850 Third Avenue, 14<sup>th</sup> Floor  
New York, NY 10022  
Telephone: (212) 687-1980  
rkaplan@kaplanfox.com  
garenson@kaplanfox.com  
mchoi@kaplanfox.com  
ldubick@kaplanfox.com

Elizabeth C. Pritzker  
Bethany L. Caracuzzo

Shiho Yamamoto

**Pritzker Law**

633 Battery Street, Suite 110  
San Francisco, CA 94111  
Telephone: (415)692-0772  
ecp@pritzker-law.com  
bc@pritzker-law.com  
sy@pritzker-law.com

Arthur N. Bailey

**Arthur N. Bailey & Associates**

111 West Second Street  
Jamestown, NY 14701  
Telephone: (716) 664-2967  
artlaw@windstream.net

*Counsel for Plaintiffs William Daly,  
Michael J. Flanagan, Darlene M.  
Kennedy and John Lohin*

By: /s/ Patrick M. Ryan

Patrick M. Ryan  
William I. Edlund  
Robert H. Bunzel  
John F. McLean  
**Bartko, Zankel, Bunzel &  
Miller**  
One Embarcadero Center, Suite  
800  
San Francisco, CA 94111  
Telephone: (415) 956-1900  
pryan@bzbm.com  
bedlund@bzbm.com  
rbunzel@bzbm.com  
jmclean@bzbm.com

Bruce L. Simon  
Robert G. Retana  
Aaron M. Sheanin  
**Pearson, Simon & Warshaw,  
LLP**  
44 Montgomery Street, Suite  
2450  
San Francisco, CA 94104  
Telephone: (415) 433-9000  
bsimon@pswlaw.com  
rretana@pswlaw.com  
asheanin@pswlaw.com

Steven A. Hart  
Brian H. Eldridge  
Elizabeth A. Schieber  
Kyle Pozan  
**Segal, McCambridge Singer  
& Mahoney, Ltd.**  
233 S. Wacker Drive, Suite  
5500  
Chicago, IL 60606  
Telephone: (312) 645-7800  
shart@smsm.com  
beldridge@smsm.com  
eschieber@smsm.com  
kpozan@smsm.com

P. John Brady  
Daniel D. Owen  
G. Gabriel Zorogastua  
**Polsinelli**  
900 W. 48th Place, Suite 900  
Kansas City, MO 64112  
Telephone: (816) 753-1000

*Counsel for Plaintiffs Yelda Mesbah  
Bartlett, Lavinia Simon Biasell, Holly  
Ann Buss, Teena Marie Johnson, Lori  
Jo Kirkhart, Tracy Elizabeth Moreno,  
David Wayne Nation, Gregory Rose,  
Lauren Jill Schneider, and Rhett  
Montgomery Tanselle*

cc: All Counsel of record (by email)